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March 23, 2020

BY ECF AND FAX (212-805-7949)

Honorable P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street, Courtroom 11D
New York, New York 10007

Re: Llambelis et al. v. Visiting Nurse Service of N.Y. et al.,
SDNY Docket No. 19-cv-10406 (PKC)

Your Honor:

In accordance with Your Honor's Individual Practices regarding requests for adjournments or extensions of time, I write to respectfully request an extension of the time for Defendant Zucker and Defendant Visiting Nurse Service of N.Y. to respond to the Class Action Complaint, ECF Doc. No. 1, from March 30, 2020 to April 27, 2020. See ECF Doc. No. 37. I also write to request that the Initial Conference, currently scheduled for April 14, 2020, be adjourned to a date and time convenient to the Court on or after May 11, 2020, conducted by teleconference pursuant to the Memorandum dated March 20, 2020 from Edward Friedland, District Executive. See id.

This is the sixth request made for an extension of time to answer and for adjournment of the Initial Conference. See ECF Doc. Nos. 18, 27, 31, 32, 34, 36. The parties continue to discuss settlement of this litigation, and request this adjournment to allow the parties to continue these discussions. This adjournment is also requested due to my client's limited availability to assist in the settlement discussions, both because of the ad hoc nature of telecommuting and the emergence of recent time-sensitive COVID-19 related work. Plaintiffs consent to this request.

Respectfully submitted,

/s/ Samantha L. Buchalter
Samantha L. Buchalter

cc: All Counsel of Record (via ECF)